

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

<b>FlavaWorks Entertainment, Inc.,</b>	)	
<b>Blatino Media, Inc.,</b>	)	
<b>Plaintiff,</b>	)	<b>Case No. : 1:24-cv-09725</b>
	)	
<b>v.</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
<b>John Doe 1, et al</b>	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' MOTION TO AMEND THE COMPLAINT AND CONVERT JOHN  
DOES TO NAMED DEFENDANTS**

NOW COME Plaintiffs, FlavaWorks Entertainment, Inc. and Blatino Media, Inc. (collectively, "Plaintiffs"), by and through their undersigned counsel, and respectfully move this Honorable Court for leave to amend the Complaint to convert certain John Doe Defendants into named Defendants. In support of this Motion, Plaintiffs state as follows:

**1. Initial Filing**

Plaintiffs filed the Complaint in this matter, initially identifying certain defendants as "**John Does**" because their identities were unknown at the time of filing.

**2. Identification of Defendants**

Through discovery, including subpoenas issued to service providers such as Google and Yahoo, Plaintiffs have identified the following individuals corresponding to certain "**John Doe**" Defendants:

- **John Doe 7** (username **daledale**) has been identified as **Rodney Block**;
- **John Doe 12** (username **hubrys**) has been identified as **Michael Shane Gordon**;
- **John Doe 23** (username **xaoslao**) has been identified as **Davon Applewhite**;

- **John Doe 25** (username **gabej25**) has been identified as **Gabriel Johnson**;
- **John Doe 26** (username **rlind50688**) has been identified as **Richard Lindner**;
- **John Doe 27** (username **Cuzz1j**) has been identified as **Joshua Cofield**.

### 3. **Method of Identification**

Plaintiffs obtained this information through diligent examination and cross-referencing of records obtained via discovery and subpoenas directed to third-party service providers, including Google and Yahoo.

### 4. **Legal Basis for Amendment**

Federal Rule of Civil Procedure 15(a)(2) provides that a party may amend its pleading only with the opposing party's written consent or the court's leave. The court should freely give leave when justice so requires.

### 5. **Necessity of Amendment**

Conversion of the John Doe Defendants to named individuals is necessary for proper service of process and for this matter to proceed efficiently and fairly.

**WHEREFORE**, Plaintiffs respectfully request that this Honorable Court:

a. Grant leave to amend the Complaint to substitute the following named Defendants in place of the corresponding John Doe Defendants:

- **John Doe 7** is **Rodney Block**;
- **John Doe 12** is **Michael Shane Gordon**;
- **John Doe 23** is **Davon Applewhite**;
- **John Doe 25** is **Gabriel Johnson**;

- **John Doe 26** is **Richard Lindner**;
- **John Doe 27** is **Joshua Cofield**;

b. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: March 17, 2025

FlavaWorks Entertainment, Inc. and

Blatino Media, Inc.

By: s/ Hameed Odunewu

Hameed Odunewu (Bar No. 6346462)

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### **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Notice of Voluntary Dismissal of John Doe Defendant No. 16 was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on March 17, 2025.

s/Hameed Odunewu

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